

305 Broadway, Suite 1000
New York, NY 10007
Telephone: (212) 513-1183
Facsimile: (646) 572-8998

Knowledge, Focus, Expertise

**HENG WANG &
ASSOCIATES P.C.**

October 22, 2018

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Huang v. WCJ Seafood Restaurant, et al
Case No. 14-cv-653

Dear Judge Caproni,

This firm represents Plaintiff in the above referenced matter. I write in response to Wong, Wong & Associates, P.C.'s ("WWA") letter dated October 22, 2018 regarding the purported discovery issues.

WWA's position is disingenuous. First, its discovery demands were not timely served. WWA did not serve its discovery demands until about 20 days before the discovery cut-off date for the attorney's fee's issue. Therefore, WWA is not entitled to receive any discovery responses in the first place due to its own inexcusable delay, and there is nothing for WWA to complaint about.

In addition, WWA is the prior counsel that handled this litigation until the completion of the trial. It has intimate knowledge about this litigation, including the communication involved and all case documents, which allows it to prepare an adequate defense to Plaintiff's claims, if it has one.

Moreover, there are legal and ethical rules pertaining to retention of closed client's files. Unless it admits it has violated these legal and ethical requirements, WWA supposedly is already in possession of all the documents it requested.

Further, the undersigned previously already offered to allow WWA to inspect the file, despite its discovery demands being untimely. However, WWA was not willing to come to inspect.

Last but not least, Plaintiff has produced verified discovery responses today, which further renders the purported discovery issue moot.

Plaintiff has timely filed her Witness List, Exhibit List, and exhibits via ECF. A cursory review of the documents filed by Plaintiff would reveal that WWA is already in possession of all the documents on Plaintiff's Exhibit List.

WWA's delay tactics are enough. For the foregoing reasons, the Court should deny WWA's unreasonable request, order it to promptly file its witness List and hearing exhibits, and conduct the evidentiary hearing in a timely manner.

Respectfully submitted,

/s/ Heng Wang
Heng Wang (HW0786)